

**IN THE DISTRICT COURT FOR MONTGOMERY COUNTY, MARYLAND**  
**(CIVIL DIVISION)**

**Sierra Baldwin**  
**2516 Sheridan Rd SE**  
**Washington, DC 20020**

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**&**

**Sierra Baldwin as parent and**  
**Legal guardian of A.B.**  
**2516 Sheridan Rd SE**  
**Washington, DC 20020**

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**Plaintiffs**

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**Case No.:**

**vs.**

\*

**Roy Free**  
**600 5<sup>th</sup> St. NW**  
**Washington, DC 20001**

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**&**

**Washington Metropolitan Area Transit Authority**  
**600 5<sup>th</sup> St. NW**  
**Washington, DC 20001**

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**Defendants**

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**COMPLAINT**

Sierra Baldwin and Sierra Baldwin as parent and legal guardian of A.B.,  
Plaintiffs, by and through their attorney, Duane O. King, Esq., sues Roy Free, and  
Washington Metropolitan Area Transit Authority (hereinafter WMATA), Defendants and  
states the following:

**CAUSE OF ACTION**

**Count I  
(Automobile Negligence)**

1. The Plaintiffs are residents of Washington, DC.
2. The Defendants are residents of Washington, DC.
3. The incident took place on Lockwood Drive in Montgomery County, MD.
4. On February 6th, 2021 Plaintiff Baldwin was traveling on Lockwood Dr. when Defendant Free, who was driving a WMATA Bus failed to yield the right of way while exiting a shopping center thereby causing a collision with the Defendant's and Plaintiffs' vehicle..
5. Both of the plaintiffs immediately felt the severe impact from the collision and suffered serious personal injuries. .
6. Defendant Roy Free, owed a duty to Plaintiffs to use due care and caution in the operation and control of the motor vehicle driven by him. Defendant Free was required to drive with care so as to reasonably protect the safety, health and life of the Plaintiff and to obey the traffic ordinances of the state of Maryland and the Motor Vehicle Code of the state of Maryland and the rules of common law.
7. Contrary to the duties owed to the Plaintiffs, Defendant Free, was negligent, careless, and reckless with respect to the following:
  - a. Failing to adhere to the state of Maryland traffic ordinances and the Motor Vehicle Code of the state of Maryland and

the rules of common law by failing to fully commit his full time and attention to driving.

- b. Failing to maintain proper control of his motor vehicle.
- c. Operating his motor vehicle in an unreasonable and unsafe rate of speed.
- d. Otherwise operating his motor vehicle in a reckless, careless, and negligent manner disregarding the safety of others on the road.

- 8. As a proximate result of Defendant's negligence, the Plaintiffs sustained serious injuries.
- 9. As a further proximate result of Defendants' negligence, Plaintiff sustained additional damages as follows:
  - a. Extensive health care expenses.

### **PRAYER**

WHEREFORE, Plaintiff prays that they be awarded judgment as against the Defendants to this complaint, Plaintiffs request the following for relief:

- a. That the court award the Plaintiffs damages in the amount of fourteen thousand dollars (\$14,000) individually against Defendant Free.;
- b. That the Court award pre-judgment interest on all sums due to Plaintiffs identified in this action;
- c. That the Court award attorneys' fees and costs of this action incurred by Plaintiffs identified in this action;

d. That the Court award such other and further relief as may be proper and to which the Plaintiffs are entitled.

**Count II**

**(Respondeat Superior)**

10. At all times relevant hereto, Defendant Roy Free, was employed by WMATA as a driver of its bus.
11. At approximately 3:26 PM., on February 6<sup>th</sup>, 2021, Roy Free, while on duty as a driver, without provocation, negligently struck the Plaintiffs' vehicle with the bus that was owned by WMATA.
12. The above described acts of Roy Free, were committed within the scope of his employment with WMATA, in that he committed them while on duty, and in furtherance of the WMATA's interests.
13. As Defendant Roy Free's employer, WMATA is responsible for all of the acts committed by Roy Free within the scope of his employment.

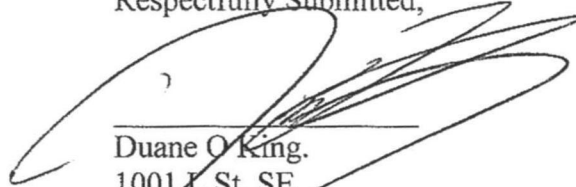
**PRAYER**

WHEREFORE, Plaintiffs pray that they be awarded judgment as against the Defendants to this complaint, Plaintiff request the following for relief:

- d. That the court award the Plaintiffs damages in the amount of fourteen thousand dollars (\$14,000) individually against WMATA;
- e. That the Court award pre-judgment interest on all sums due to Plaintiff identified in this action;
- f. That the Court award attorneys' fees and costs of this action incurred by Plaintiff identified in this action;

e. That the Court award such other and further relief as may be proper and to which the Plaintiff is entitled.

Respectfully Submitted,

A large, stylized handwritten signature in black ink, appearing to read 'Duane O. King', is written over a horizontal line.

Duane O. King.  
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Washington, DC 20003  
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Counsel For the Plaintiffs  
CPF ID: 0512140145